

EXHIBIT F

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

1		:	
2		:	
3		:	
4	HIS ALL HOLINESS,	:	Case No.
5	BARTHOLOMEW I, THE	:	3:18-CV-17195-RK-DEA
6	ARCHBISHOP OF	:	
7	CONSTANTINOPLE, NEW	:	
8	ROME, AND ECUMENICAL	:	VIDEO-RECORDED
9	PATRIARCH, ET AL.,	:	DEPOSITION UPON
10		:	ORAL EXAMINATION
11	Plaintiffs,	:	OF
12		:	FATHER ALEXANDER
13	V.	:	KARLOUTSOS
14		:	AS RULE 30(b)(6)
15	PRINCETON UNIVERSITY,	:	REPRESENTATIVE OF
16		:	H.A.H. BARTHOLOMEW I
17	Defendant.	:	
18		:	
19		:	
20	-----	:	X

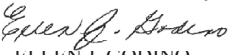
TRANSCRIPT of the stenographic notes of
the proceedings in the above-entitled matter, as
taken by and before ELLEN J. GODINO, CCR, RPR, CRCR,
held via ZOOM VIDEOCONFERENCE from various locations,
with the witness located at THE CHURCH OF THE
DORMITION OF THE VIRGIN MARY, 111 Saint Andrews Road,
Southampton, New York, on Wednesday, March 13, 2024,
commencing at 10:09 a.m.

<p>1 manuscripts taken from -- that were previously at 2 various monasteries in Greece, and allegedly taken 3 during various wartime periods; was that an important 4 issue to the Ecumenical Patriarch?</p> <p>5 MS. PAMUKCU: Objection.</p> <p>6 A. It was a significant issue.</p> <p>7 MR. TSOUGARAKIS: Can I hear the 8 question again?</p> <p>9 THE COURT REPORTER: Sure.</p> <p>10 MR. TSOUGARAKIS: Let me postpone this, 11 my computer is updating. I'm sorry.</p> <p>12 MS. PAMUKCU: Should we go off the 13 record?</p> <p>14 (A discussion is held off the record.)</p> <p>15 MR. GOLDFARB: If the court reporter 16 could read the question back, we could use the help, 17 please.</p> <p>18 (The question is read back.)</p> <p>19 BY MR. GOLDFARB:</p> <p>20 A. Again, the Patriarch would be very 21 concerned about getting all of its spiritual, 22 cultural legacy back. He would leave that with the 23 Metropolitans. There were other things that the 24 Ecumenical Patriarch was very concerned about; even 25 his own election. Unfortunately, the Turkish</p> <p style="text-align: right;">Page 74</p>	<p>1 other areas of responsibility would be to claim that 2 which belonged to your monasteries and to your 3 churches in your own metropolis.</p> <p>4 That's what he would delegate, and 5 that's what he did delegate. But he was not 6 Patriarch until 1991.</p> <p>7 Q. So beginning in 1991, did the Ecumenical 8 Patriarch Bartholomew, did he have any conversations 9 with the Metropolitan of Drama regarding manuscripts 10 allegedly taken from the monastery?</p> <p>11 A. Yes, he spoke to the Metropolitan of 12 Drama, his name was Dionysios at the time, and told 13 him to pursue the manuscripts and find out where they 14 are. And the Bulgarian government.</p> <p>15 Q. Well, I'm sorry.</p> <p>16 A. From -- ask the Greek -- that the 17 Metropolitan would reach out to the Greek government, 18 and make the appeal out to the Bulgarian government. 19 And I believe six years ago -- and I know that, the 20 Ecumenical Patriarch himself made a personal appeal, 21 when he went to Bulgaria, spoke to the president of 22 Bulgaria, asked him to return the manuscripts.</p> <p>23 And then the meeting -- and the 24 Bulgarian president welcomed him warmly. The next -- 25 he had a meeting scheduled with the prime minister of</p> <p style="text-align: right;">Page 76</p>
<p>1 government would interfere in the election of the 2 Ecumenical Patriarch.</p> <p>3 Our school was closed. We have a 4 seminary called Halki. It's been closed since 1971. 5 We're dealing with a church that has been 6 asphyxiated. It's not so easy to say, well, now 7 we've got to worry about the monasteries that have 8 been -- he leaves that to the Metropolitans. They 9 were supposed to be looking after it. But that's not 10 something that the Ecumenical Patriarch would take on 11 for himself. That would be the jurisdiction of the 12 Metropolitans.</p> <p>13 Q. Did the Ecumenical Patriarch make any 14 effort to search for manuscripts, or to find out 15 where manuscripts taken from monasteries were 16 located, in the '70s, '80s or '90s?</p> <p>17 MS. PAMUKCU: Objection.</p> <p>18 A. What the Ecumenical Patriarch would do 19 would speak with the Metropolitans and say, "Your 20 responsibility is to pastor your flock." Pastoring 21 your flock does mean, maintain the spiritual and the 22 manuscript -- whatever, relics entrusted to you. The 23 bones of the saints, for example. They would be 24 responsible for the liturgical function of the 25 church. Making sure the pastors -- and one of the</p> <p style="text-align: right;">Page 75</p>	<p>1 Bulgaria. And then the next day, they cancelled the 2 meeting with the prime minister of Bulgaria.</p> <p>3 It's been a very sensitive issue between 4 the Greek state and the Bulgarian government. And to 5 this day, it's still very painful for those of us of 6 Greek Orthodox faith.</p> <p>7 Q. Well, on one visit, the Ecumenical 8 Patriarch was actually surprised in Bulgaria. They 9 presented the Ecumenical Patriarch with certain 10 manuscripts that he could take with him. Correct?</p> <p>11 A. Yes.</p> <p>12 Q. Back in 2004?</p> <p>13 A. Yes. And so he asked for the rest of 14 them to be returned.</p> <p>15 Q. And because I had read an article that 16 referred to -- involved with this matter at that 17 time, a Professor Vasilis Atsalos. Are you familiar 18 with Professor Atsalos?</p> <p>19 A. No.</p> <p>20 Q. And if the Ecumenical Patriarch wanted 21 to conduct a search -- well, strike that.</p> <p>22 What did the Ecumenical Patriarch expect 23 the Metropolitan of Drama to do, to locate allegedly 24 stolen manuscripts?</p> <p>25 MS. PAMUKCU: Objection.</p> <p style="text-align: right;">Page 77</p>

<p>1 His responsibility, as the Ecumenical 2 Patriarch, as the chief shepherd, is to make sure 3 that the relics, the manuscripts, all of our 4 spiritual, cultural legacy stays within the Church. 5 Because we worship with them, we pray with them, and 6 we hope in them. 7 And that's what we're hoping for in 8 Princeton. Because I notice this was a letter 9 requesting that Princeton would return it. It was 10 not -- it was not a lawsuit. We could have done 11 that. 12 We reached out because we felt that 13 anybody that has on its logo New Testament and Old 14 Testament would at least honor the Old and the New 15 Testament. And that's been very painful in regards 16 to Princeton, so I have to tell you that's very 17 painful. How does one have it as a logo, and be very 18 proud that it was established as a seminary, and then 19 refuse to give back that which the Old Testament and 20 the New Testament calls upon? 21 So yes; the Patriarch would have wanted 22 them back, and we still want them back. And we hope 23 that you, as a representative of Princeton, would 24 make it clear that we don't want this lawsuit. What 25 we want is our relics back. We want our manuscripts</p> <p style="text-align: right;">Page 82</p>	<p>1 sorry, Metropolitan Demetrios -- 2 A. Dionysios? 3 Q. Demetrios? 4 A. No, you're talking about the Ecumenical 5 Patriarch? 6 Q. The Ecumenical Patriarch -- 7 (Court Stenographer clarification.) 8 A. Well, then it's -- yeah, he's called 9 Ecumenical Patriarch Demetrios, yeah. 10 Q. Yes. The fact is, he did travel to the 11 United States in the summer of 1990. Correct? 12 A. But that was after -- yeah, it was the 13 first time. And I'm so happy that the Turkish 14 government allowed that. And I was -- I've got to 15 tell you, I celebrate the Turkish government for 16 doing so. But yes, he did come in 1990. 17 Q. All right. So is the extent of 18 Metropolitan -- I'm sorry. Is the extent of the 19 Ecumenical Patriarch Demetrios' efforts to recover 20 manuscripts allegedly stolen from the monastery in 21 1917, giving that charge to the Metropolitan of 22 Drama? 23 MS. PAMUKCU: Objection. 24 A. He would have told the Metropolitan of 25 Drama: Pursue getting back your spiritual, cultural</p> <p style="text-align: right;">Page 84</p>
<p>1 back. Yes, sir. 2 Q. Did the Ecumenical Patriarch Demetrios 3 make any efforts to search for the manuscripts that 4 were allegedly stolen from the monastery in 1917? 5 A. I've told you that every Ecumenical 6 Patriarch in the history of the Patriarchate would 7 want that which belongs to us. So I'm sure the 8 Ecumenical Patriarch told the Metropolitans: Do 9 whatever you can to receive those documents, yes, 10 these manuscripts. 11 Q. And was that the extent of Metro -- of 12 Ecumenical Patriarch Demetrios's efforts, by giving 13 charge to the Metropolitan of Drama to search for 14 those manuscripts? 15 MS. PAMUKCU: Objection. 16 A. Yes, and if I can comment. You must 17 realize: At that time, the Ecumenical Patriarch was 18 not even allowed to travel outside of Turkey to ask 19 for it themselves. Right? The Patriarchate's 20 movements were -- were constrained and restrained in 21 Turkey. 22 Q. Well -- 23 A. I would imagine if he could go there 24 himself, he would have done that. 25 Q. Well, Metropolitan Dionysios -- I'm</p> <p style="text-align: right;">Page 83</p>	<p>1 legacy. And we do know at that time from 1917, that 2 they were in Bulgaria. 3 Q. Well, isn't it true that the 4 Metropolitan of Drama learned of many manuscripts 5 that purportedly came from that group that were not 6 in Bulgaria, and in fact, were in Western Europe and 7 the United States? 8 MS. PAMUKCU: Objection. 9 A. In retrospect, we now know that, but we 10 did not know it when the Metropolitan apparently 11 discovered it, yes. 12 MR. GOLDFARB: Why don't we take a quick 13 break, and then we'll come back. All right? 14 THE WITNESS: Thank you. 15 MR. GOLDFARB: Thank you. Ten minutes, 16 is that okay? Or do you want -- at some point, if 17 anybody needs a lunch break, let me know, and we'll 18 make it a half hour instead of ten minutes? 19 (Court Stenographer clarification.) 20 THE VIDEOGRAPHER: Sorry. Yeah. Going 21 off the record. The time is 12:17 p.m. Eastern. 22 This is the end of Media Unit 2. 23 (A brief recess takes place.) 24 THE VIDEOGRAPHER: We are back on the 25 record. The time is 12:29 p.m. Eastern. This is the</p> <p style="text-align: right;">Page 85</p>

<p>1 Metropolitan of Drama Dionysios had this specific 2 information, particularly about the manuscripts at 3 Princeton Library, at least by 1995. 4 And do you know of any reason why 5 Metropolitan Dionysios took no action? 6 MS. PAMUKCU: Objection. 7 A. I don't know. 8 Q. If he had this particular information, 9 which we know he did, we can read it in the book, 10 would it be the Ecumenical Patriarch Bartholomew's 11 view that Metropolitan Dionysios failed in his 12 responsibility to take charge of the matters that had 13 been entrusted to him? 14 MS. PAMUKCU: Objection. 15 A. At the end of the day, I believe the 16 Patriarch did not, because he didn't know it. But 17 looking at it in retrospect, you'd have to say he did 18 not inform him. So I would imagine he didn't execute 19 his duties as well as others do. 20 But this is -- it's tragic that he did 21 not pursue it. 22 MR. GOLDFARB: I think this is probably a 23 good time for a break and a lunch break for the court 24 reporter and the videographer and everyone, and 25 yourself as well, Father Alex.</p> <p style="text-align: right;">Page 118</p>	<p>1 you started, "Indicatively, we mention the 2 following"? 3 A. Yes, sir. 4 Q. And there's a Footnote 26. Correct? 5 A. Yes, sir. 6 Q. And it's a citation to Professor 7 Papazoglou's writing from the symposium "Kavala and 8 its Area" in 1996, in the Proceedings (Kavala 1987), 9 A, pages 53 to 56. Do you see that? 10 A. Yes, sir. 11 Q. And then it indicates it was republished 12 in Manuscripts and Libraries of Eastern Macedonia and 13 Thrace, Volume A, Komotini 1993. Do you see that? 14 A. Yes, sir. 15 Q. Now, we have a -- 16 MR. GOLDFARB: Is it in their thing? 17 Q. You should have a new exhibit -- I'm 18 sorry. Strike that. 19 MR. GOLDFARB: Is it in the thing? Does 20 he have it in his notebook? 21 MR. SNEED: Yes. 22 Q. So Father Alex, do you have an 23 Exhibit 5A in that notebook? 24 MR. TSOUGARAKIS: In Greek? 25 MR. GOLDFARB: Yes, it should be -- it</p> <p style="text-align: right;">Page 120</p>
<p>1 THE WITNESS: Thank you very much. 2 THE VIDEOGRAPHER: All right. Going off 3 the record. The time is 1:14 p.m. Eastern time. 4 This is the end of Media Unit 3. 5 (A luncheon recess takes place.) 6 THE VIDEOGRAPHER: We're back on the 7 record. The time is 1:50 p.m. This is the beginning 8 of Media Unit 4. 9 CONTINUED EXAMINATION BY MR. GOLDFARB: 10 Q. Father Alex, when we left off, you were 11 at page 136 of the translated version of Deposition 12 Exhibit 5. Are you still on that page? 13 A. Yes, and may I make a comment here? 14 Q. If you feel it's important. 15 A. Well, just to correct. The reason why 16 they have "Durham, South Carolina" is because when 17 you put "Durham, N. Carolina" in Greek, the "N" means 18 south, "V" means north. That's why that mistake was 19 made in the translation. 20 Q. Thank you. I appreciate that. 21 A. Not a problem. 22 Q. All right. So we're on that page, 23 though, and you see at the end of that long 24 paragraph, that indicates -- I'm sorry. Strike that. 25 At the beginning of that sentence, where</p> <p style="text-align: right;">Page 119</p>	<p>1 should be Greek followed by the English translation. 2 It should be five pages of a bibliography. 3 MR. TSOUGARAKIS: Yep, it's 5 -- it's 4 5A1. 5 MR. GOLDFARB: Yes. 6 Q. 5A1 is the Greek version, and 5A2 is the 7 English translation. And this is the bibliography 8 from the History of Drama, Exhibit 5. Okay? 9 A. Yes, sir. 10 Q. And if you could turn to page -- let me 11 make sure. I believe it's page 256 of the 12 bibliography? 13 MS. PAMUKCU: Steve, just a minute. Was 14 5A posted on the Exhibit Share? 15 MR. GOLDFARB: It is now. 16 MS. PAMUKCU: Okay. 17 MR. GOLDFARB: Do you have it, Erin? 18 MS. PAMUKCU: One second. Yeah, yeah, I 19 can see it. 20 MR. GOLDFARB: Okay. 21 And George, I apologize. When we 22 originally marked this for Metropolitan Pavlos's 23 deposition, apparently only two pages of the 24 bibliography were included, and -- or two or three 25 pages. And when I figured that out, I wanted to</p> <p style="text-align: right;">Page 121</p>

<p>1 A. Again, that's an assumption. I don't 2 know that. I mean, you're -- I can't assume that 3 that's what he would do. I mean, that's -- that's 4 not what I'm aware of, or the Ecumenical Patriarch is 5 aware of what he's doing or not doing. 6 Q. Well -- 7 A. It's just very clear. 8 (Court Stenographer clarification.) 9 Q. Metropolitan Dionysios was charged with 10 the task by the Ecumenical Patriarch of searching for 11 these manuscripts. Correct? 12 A. Yes. 13 Q. And he wrote a book where he cited to 14 this specific -- this specific work by Atsalos. 15 Correct? 16 A. Apparently. This is from his book, yes. 17 Q. Which was published in the Municipality 18 of Drama in 1990. Correct? 19 MS. PAMUKCU: Objection. 20 Q. Right here? 21 A. It says 1990, yes. 22 Q. And then on page 115 -- I'm sorry, let 23 me get the right page here. Page 117 includes 24 similar type of information on Princeton Library, 25 regarding -- let's see -- Garrett 14 and Garrett 16?</p> <p style="text-align: right;">Page 142</p>	<p>1 words, what is his proof -- 2 Q. We don't get to his conclusions -- we 3 don't get to his conclusions until we get to the page 4 that says, "Findings and Expert Opinions on the Lost 5 Kosinitza Monastery -- Monastery Manuscripts." But 6 there's a whole section on the adventures of the 7 manuscripts, in which Atsalos, in 1990, in the 8 municipality of Drama, published an entire -- an 9 entire summary of how each and every manuscript that 10 was found in Western Europe and the United States, 11 how it got from the monastery to wherever it's 12 located. Except that the manuscripts from Princeton, 13 it was concluded, could not be determined with 14 certainty whether they were actually at the monastery 15 in 1917 when it was raided, or whether or not they 16 had been sold to a Turkish gentleman prior to the 17 First World War? 18 MS. PAMUKCU: Objection. 19 MR. TSOUGARAKIS: Is there a question? 20 Q. Have you -- has the Ecumenical Patriarch 21 ever been made aware of this information, that as of 22 1990, there were researchers who had been tasked with 23 researching this topic, who had located the 24 identity -- the identity and location of all of the 25 manuscripts in Western Europe and the United States,</p> <p style="text-align: right;">Page 144</p>
<p>1 MS. PAMUKCU: Objection. 2 A. It does say that, yes, sir. 3 Q. Let me see if I can -- I might have gone 4 past it. It's hard to do. 5 And did you know that -- well, did you 6 know that Atsalos was a professor who was studying 7 this in the region of Drama during the late '80s and 8 '90s, at the same time as Professor Papazoglou? 9 MS. PAMUKCU: Objection. 10 A. No, I don't know that. I don't know if 11 the Ecumenical Patriarch knows that. I don't know 12 that. 13 Q. Do you see how in this page, which is 14 page 122 of Atsalos, and you can take a moment to 15 read this. It provides his expert analysis of the 16 background to determine whether the manuscripts 17 located in various places, including at Princeton, 18 were or were not present at the monastery in 1917, 19 when the Bulgarians raided? 20 MS. PAMUKCU: Objection. 21 A. Where did we read this? I don't know. 22 MR. TSOUGARAKIS: Steve, is there a 23 question pending? 24 A. Are these conjectures, or his 25 conclusions? I don't know what that is. In other</p> <p style="text-align: right;">Page 143</p>	<p>1 and published that information and their opinions? 2 MS. PAMUKCU: Objection. 3 Q. Did the Ecumenical Patriarch know that? 4 A. He knows it now. 5 Q. Okay. Would the -- well, going back to 6 what we were talking about before the break: Is it 7 fair to conclude that the Ecumenical Patriarch would 8 have expected Metropolitan Dionysios to bring this to 9 his attention in the 1990s, if he had this 10 information available to him? 11 A. He would have probably expected that, 12 yes, of course. He would have -- go ahead. 13 Q. Metropolitan Dionysios, he had the 14 authority to take action to -- on behalf of the 15 Metropolis and the monastery, in order to take action 16 to seek its return, without even consulting with the 17 Ecumenical Patriarch. Correct? 18 MS. PAMUKCU: Objection. 19 A. He would have had to seek permission 20 from the Ecumenical Patriarch to seek action. The 21 difficulty comes in is that if you know, at that 22 period of time, it was very hard for them to do those 23 things. 24 It's not as simple as we are, in a free 25 country, to be able to exercise it. And with the</p> <p style="text-align: right;">Page 145</p>

<p>1 finance something about which I'm concerned about.</p> <p>2 No, I would never do that.</p> <p>3 Q. If you wanted to raise funds, you would</p> <p>4 only do that with someone you know?</p> <p>5 MS. PAMUKCU: Objection.</p> <p>6 A. In most places of the world, when you</p> <p>7 raise funds, it's from people you know. That's what</p> <p>8 makes you a fundraiser. If you're going out</p> <p>9 fundraising with people you don't know, then you're</p> <p>10 not a fundraiser. You're not going to raise any</p> <p>11 funds.</p> <p>12 Q. I agree with you.</p> <p>13 A. I know you do. It's only logical.</p> <p>14 Q. Okay. Father Alex, I don't have any</p> <p>15 further questions for you at this time. I appreciate</p> <p>16 your patience and your time today. And I know it was</p> <p>17 inconvenient and a long day, but thank you very much.</p> <p>18 A. I think you've been very kind, sir, and</p> <p>19 I appreciate that.</p> <p>20 And again, this lawsuit is a painful one</p> <p>21 for us. All we want is our manuscripts back. It was</p> <p>22 a violation in 1917, and whether some people want to</p> <p>23 call it in the Balkan Wars or something else, this</p> <p>24 belongs to a monastery, and it's for us sacred, very,</p> <p>25 very sacred.</p> <p style="text-align: right;">Page 254</p>	<p>1 J U R A T</p> <p>2</p> <p>3 I DO HEREBY CERTIFY that I have read the</p> <p>4 foregoing transcript of my deposition testimony and I</p> <p>5 certify that is it true and correct to the best of my</p> <p>6 knowledge.</p> <p>7</p> <p>8</p> <p>9</p> <p>10 FATHER ALEXANDER KARLOUTSOS</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15 SWORN AND SUBSCRIBED</p> <p>16 BEFORE ME ON THIS</p> <p>17 DAY OF 2024</p> <p>18</p> <p>19 Notary Public of the State of</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 256</p>
<p>1 I thank you very much. Enjoy your</p> <p>2 family and your friends. And thank you for all</p> <p>3 helping and guiding us.</p> <p>4 And thank you, Erin, and thank you</p> <p>5 George and everyone else, Jeanine.</p> <p>6 MR. GOLDFARB: Have a happy Easter as</p> <p>7 well.</p> <p>8 THE WITNESS: That will be May 5th for</p> <p>9 us, including the Bulgarians and the Russians.</p> <p>10 MR. TSOUGARAKIS: It's "Greeko de Mayo"</p> <p>11 for us, yeah.</p> <p>12 THE VIDEOGRAPHER: Sorry, Counsel, do</p> <p>13 you have any questions for the witness or are we</p> <p>14 done?</p> <p>15 MR. TSOUGARAKIS: We're done.</p> <p>16 MS. PAMUKCU: We're done.</p> <p>17 THE VIDEOGRAPHER: Okay. We are off the</p> <p>18 record at 5:58 p.m. Eastern Daylight Savings time.</p> <p>19 And this concludes today's testimony given by Father</p> <p>20 Alex Karloutsos. The total number of media used was</p> <p>21 six, and will be retained by Veritext.</p> <p>22 (The proceedings concluded at 5:58 p.m.)</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 255</p>	<p>1 C E R T I F I C A T E</p> <p>2 I, ELLEN J. GODINO, CCR, CRCR, RPR, do hereby</p> <p>3 certify that prior to the commencement of the</p> <p>4 examination, FATHER ALEXANDER KARLOUTSOS was duly</p> <p>5 sworn by me to testify the truth, the whole truth and</p> <p>6 nothing but the truth.</p> <p>7 I DO FURTHER CERTIFY that the foregoing is a</p> <p>8 true and accurate transcript of the testimony as</p> <p>9 taken stenographically by and before me at the time,</p> <p>10 place and on the date hereinbefore set forth, to the</p> <p>11 best of my ability.</p> <p>12 I DO FURTHER CERTIFY that I am neither a</p> <p>13 relative nor employee nor attorney nor counsel of any</p> <p>14 of the parties to this action, and that I am neither</p> <p>15 a relative nor employee of such attorney or counsel,</p> <p>16 and that I am not financially interested in the</p> <p>17 action.</p> <p>18</p> <p>19 </p> <p>20 ELLEN J. GODINO</p> <p>21 CERTIFIED COURT REPORTER</p> <p>22 REGISTERED PROFESSIONAL REPORTER</p> <p>23 CERTIFIED REALTIME COURT REPORTER</p> <p>24 DATED: March 26, 2024</p> <p>25</p> <p style="text-align: right;">Page 257</p>